

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director
and Attorney-in-Chief

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

May 15, 2023

VIA ECF and Email

The Honorable Richard Berman
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Jaylen Martinez*, 22 Cr. 668 (RMB)

Dear Judge Berman,

I write with the consent of the government and Pretrial Services to respectfully request (1) a modification of Mr. Martinez's bail conditions to remove his ankle monitor, and (2) a 30-day adjournment of Mr. Martinez's status conference, currently scheduled for May 23, 2023. Last week Mr. Martinez was in an accident and sustained an injury to his leg. He is currently hospitalized at St. Barnabus Hospital awaiting surgery. In order to proceed with surgery Mr. Martinez will need to have his ankle monitor removed. Pretrial Services has no objection to a permanent and ongoing removal of the monitor. Mr. Martinez has been under the supervision of Pretrial Services for over five months and has been in full compliance with the mandates set forth by the Court and Pretrial Services.

In light of Mr. Martinez's impending surgery, I am further requesting an adjournment of the status conference to allow Mr. Martinez sufficient time to recover before having to appear in court. I expect that a 30-day adjournment will be sufficient, but I will update the Court about any changes in Mr. Martinez's medical condition.

Thank you for your consideration of this request.

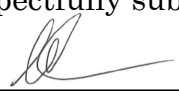
On consent, bail conditions modified to
remove ankle monitor. Conference is
adjourned to 6/27/23 at 12:00 noon.
Time is excluded pursuant to the Speedy
Trial Act for the reasons set forth in this
letter.

SO ORDERED:

Date: 5/15/23

Richard M. Berman
Richard M. Berman, U.S.D.J.

Respectfully submitted,


Tamara L. Giwa
Counsel for Jaylen Martinez
Federal Defenders of New York
(917) 890-9729